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10 **UNITED STATES DISTRICT COURT**  
11 **CENTRAL DISTRICT OF CALIFORNIA**  
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13 **UNITED AFRICAN-ASIAN**  
14 **ABILITIES CLUB, ON BEHALF OF**  
15 **ITSELF AND ITS MEMBERS;**  
16 **JAMES LEE, An Individual**

17 **Plaintiffs,**

18 v.

19 **OMNINET KIPLING, LP; and DOES**  
20 **1 THROUGH 10, Inclusive**

21 **Defendants**

22 Case #: 2:23-cv-01371 JFW (JCx)

23 **NOTICE OF VOLUNTARY**  
24 **DISMISSAL WITH PREJUDICE OF**  
25 **ENTIRE ACTION AFTER**  
26 **SETTLEMENT**

27 [Fed. R. Civ. P. Rule 41(a)(1)]

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2 Dismissal With Prejudice Of Entire Action  
3 Case# 2:23-cv-01371 JFW (JCx)

1 IT IS HEREBY NOTICED by all the Plaintiffs, pursuant to Federal Rules of  
2 Civil Procedure Rule 41 (a)(1), that all the Plaintiffs hereby dismiss WITH prejudice  
3 all Defendants and the present action in its entirety. The Parties to this action have  
4 settled this case in its entirety. Defendants have not filed an answer or a motion for  
5 summary judgment. Pursuant to FRCP and Ninth Circuit Court authority, Plaintiffs  
6 Notice of Voluntary Dismissal is effective immediately and does not require an Order  
7 from the court.

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10 **IT IS SO NOTICED.**

11 Dated: 05/11/2023

Lightning Law, APC

12 /S/ David C. Wakefield  
13 By: DAVID C. WAKEFIELD, ESQ.  
14 Attorney for all Plaintiffs

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Dismissal With Prejudice Of Entire Action  
Case# 2:23-cv-01371 JFW (JCx)

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2                   **PROOF OF SERVICE**  
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STATE OF CALIFORNIA, COUNTY OF SAN DIEGO

I employed in the County of San Diego, State of California. I am over the age of 18 and not a party to the within action. My business address is 10620 Treena Street, Suite 230, San Diego, CA 92131.

On 05/11/2023, I served the documents described below on all interested parties in the attached service list by the method indicated below:

7                   **1. NOTICE OF VOLUNTARY DISMISSAL WITH PREJUDICE OF**  
8                   **ENTIRE ACTION AFTER SETTLEMENT**

11               **BY MAIL** - I deposited such envelope in the mail at San Diego, California.  
12               The envelope was mailed with postage thereon fully prepaid. I am "readily  
13               familiar" with the firm's practice of collection and processing correspondence  
14               for mailing. Under that practice it would be deposited with the U.S. Postal  
15               Service on that same day with postage thereon fully prepaid at San Diego,  
16               California in the ordinary course of business. I am aware that on motion of the  
17               party served, service is presumed invalid if postal cancellation date or postage  
18               meter date is more than one (1) day after date of deposit for mailing in  
19               affidavit.

20               **BY PERSONAL SERVICE** – I caused such envelope to be delivered by a  
21               process server.

22               **VIA FACSIMILE** – I faxed said document, to the office(s) of the addressee(s)  
23               shown above, and the transmission was reported as complete and without error.

24               XXXX **BY ECF ELECTRONIC TRANSMISSION** – I transmitted a PDF  
25               version of this document by electronic transmission to the party (s) identified  
26               on the attached service list using the court supported ECF e-mail to the  
27               address(s) indicated.

28               **BY OVERNIGHT DELIVERY** – I deposited such envelope for collection

1 and delivery by the Federal Express with delivery fees paid or provided for in  
2 accordance with ordinary business practices. I am "readily familiar" with the  
3 firm's practice of collection and processing packages for overnight delivery by  
4 Federal Express. They are deposited with a facility regularly maintained by  
Federal Express for receipt on the same day in the ordinary course of business.

5 \_\_\_\_\_ (State) I declare under penalty of perjury under the laws of the State of  
California that the above is true and correct.

6 XX (Federal) I declare that I am employed in the office of a member of the  
bar of this Court at whose direction the service was made.

7 At San Diego, California.  
8

9 /s/David C. Wakefield  
DAVID C. WAKEFIELD  
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11 **SERVICE LIST**  
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